



THE NEWARK PUBLIC SCHOOLS
Information Services Division
2 Cedar Street
Newark, New Jersey 07102-3091
Phone/Fax: 973-733-8774



Christophe D. Cerf
State District Superintendent

David Hespe
Commissioner of Education

Valerie Wilson
School Business Administrator

Troy Fischer
Chief Information Officer

Federal Communications Commission
442 12th St. S.W.
Washington, DC 20554

Re: WC Docket No. 13-184

Esteemed Members of the Federal Communications Commission:

In response to the above regarding the sufficiency of the category two budgets and as an applicant serving over 35,000 students in an urban impoverished school district, please let me start with sincere thanks for the work you have done in creating a program that brings the opportunity for balance in the education of our future. Our students have been the recipient of Federal funding through the E-rate program since its inception. Being an urban district with over 86% of our students qualifying for free or reduced lunch our students have been able to obtain much needed access to global resources. During the first phase of E-rate our students were able to obtain Internet circuits and multiple WAN links and the equipment to connect them to resources beyond the brick and mortar of their educational building. Through the years, the district has been able to grow those connections from their infancy and ISDN circuits to Ethernet connections capable of 10 GB of service to our data centers and ultimately over 20GB of Internet bandwidth as educational programs have dictated.

That being said, the most recent Modernization Order has handicapped our ability as the stewards of these funds to provide district wide upgrades. The District has maintained a 21st century approach towards education and computing needs. With a District the size of Newark, we have maintained standards that allowed for equal opportunities regardless of the size of the student's school or their zip code. The District was able to manipulate funding requests and plan for growth for The District. The Modernization Order has limited the ability of our smaller populated schools to "keep up" with their larger counterparts. Programs contained in these schools are dictated by the population they serve, our most vulnerable learners – medically fragile, youngest and others.

Changing Hearts and Minds to Value Education

Upgrades to The Districts infrastructure that would allow for higher bandwidth, as curriculum changes dictate, are limited to those locations as their category two budget is finite for five years. The previous program allowed, through the two-in-five program, the ability to recycle internal connections to programs that did not meet the category two funding percentage of the current funding year. This is not to say The District has been derelict in its technology or curriculum planning. However, in an effort to maintain peak efficiency of the support personnel standards have been put in place allowing for de minimus down time when failures occur. Below, please see examples, as to how the needs of the District for maintenance of internal connections and upgrades to the core have depleted funds available to many of our students that will hamper our ability to upgrade the wireless infrastructure to their schools. Funding reimbursements, previously received from category one voice services, is no longer available to bridge these gaps. In addition, the need to budget and pay in full for all voice services has diverted funding for these, otherwise eligible, category two services.

During the first years of the Modernization Order, the District performed upgrades to the core switches in all of our buildings to accommodate 10 GigE WAN links to the Districts data centers. In addition, many of the aggregate switches in the schools were replaced to make ready for the wireless LAN replacements requiring PoE ports. The table below documents three examples of the funding utilization in our district. The first location is a special needs school, the second entity is a general education PK-8 and the last is one of our new high schools.

Entity	C2 Budget	2015	2016	Balance
7090	37,050.00	32,275.30	1,117.20	2,471.30
7091	100,500.00	24,265.36	1,865.23	78,809.14
7101	122,400.00	106,267.68	1,844.23	16,682.39

All are in need of wireless network replacements. However, the funding is too disparate to implement a standard wireless infrastructure throughout the District. The previous funding formula allowed District's the ability to apply for funding for our neediest schools and supplement from previous reimbursements from category one voice decisions.

Thank you for the opportunity for comment.

Sincerely,



Troy Fischer
Chief Information Officer